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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$209,815 IN UNITED STATES CURRENCY,

Defendant.

JULIO FIGUEROA,

Claimant.

CASE NO. 14-0780 SC

STIPULATION AND ORDER OF
THE PARTIES RE: SCHEDULING

On April 28, 2015, the Court denied the motion of the United States to strike and ordered that the parties complete general discovery in 75 days (by July 10, 2015), identify experts within 14 days (by July 24, 2015) thereafter, identify rebuttal experts within 21 days (by August 14, 2015) thereafter, and complete expert discovery within 31 days (by September 14, 2015) thereafter. Subsequently, claimant filed a motion for summary judgment on May 1, 2015 which is scheduled for a June 12, 2015 hearing and suggested that the parties stay discovery until his motion is resolved. Although the United States submits there is no need to stay discovery pending claimant's motion and can conclude discovery by July 10, 2015 as ordered, the United States does not object to a stay providing the previously set time limits are proportionately extended.

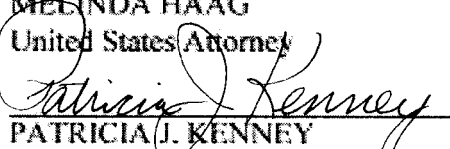
Accordingly, the parties stipulate and agree, subject to the Court's approval, that the following deadlines will apply following the Court's ruling on claimant's motion for summary judgment:

1. The parties have 75 days to complete discovery from the date of the Court order resolving claimant's motion.
2. The parties call the clerk to schedule a case management conference approximately two weeks before the close of discovery.
3. The parties have 14 days from the close of discovery to identify experts.
4. The parties have 21 days from the identification of expert witnesses to identify rebuttal expert witnesses.
5. The parties have 30 days from the identification of rebuttal expert witnesses to complete expert discovery.

IT IS SO STIPULATED:

Dated: May 7, 2015

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PATRICIA J. KENNEY
Assistant United States Attorney
Attorneys for the United States

LAW OFFICES OF DAVID M. MICHAEL

Dated: May 2, 2015


DAVID M. MICHAEL
EDWARD M. BURCH
Attorneys for Julio Figueroa

PURSUANT TO THE FOREGOING, IT IS SO ORDERED AND THE PARTIES SHALL FOLLOW THE AGREED UPON SCHEDULING DATES AS SET FORTH IN THE STIPULATION ABOVE.

Dated: May 13, 2015


THE HONORABLE SAMUEL CONTI
United States District Judge